

Appendix B

Potts Creek Vegetation Project

Response to Comments from Initial Project Scoping Period

On October 6, 2020 the District released a scoping letter seeking comments regarding the Potts Creek Vegetation Project. The Forest Service received correspondence from eighteen individuals, organizations, and agencies. These comments have been analyzed and responded to using a process called content analysis. All notable comments were assigned a unique contact number generated from the correspondence number and the comment number (e.g. #18-2 would be the second comment identified from letter number 18). Commenters and their associated organizations are shown in Table 1, below.

The following is a summary of the comments received pertaining to the scoping letter and an agency response. Comments have been condensed, however, the entirety of each comment is available in the project analysis record. Similar comments were grouped together and for each group a concern statement was developed. Concern statements are meant to capture the thought, idea, or issue common to all of the associated comments. They often represent the view of many respondents, but may also be derived from just one person’s input. Concern statements provide the framework for preparing responses to public comment.

Comments may:

- Identify issues (cause and effect relationship between proposed action and effects);
- Suggest alternative ways to conduct the action, or lessen the impacts of the action through mitigation or project design feature;
- Suggest a method to measure effects; and/or,
- Provide new information for the interdisciplinary team to consider.

Not all comments are relevant to the decision; comments are not relevant (non-substantive) if they are:

- Beyond the scope of the proposal;
- Unrelated to the decision being made;
- Already decided by law, regulation or policy;
- Conjectural in nature or not supported by scientific evidence; or,
- General in nature (not specific to this project) or position statements not supported by reasons.

Table 1. Respondents to Potts Creek Vegetation Project Scoping Period

Letter #	Author Name	Organization Name	Date Submitted
First Comment Period (10/6/20 to 11/5/20)			
01-#01	Hepler, Gratten		10/7/2020

Letter #	Author Name	Organization Name	Date Submitted
01-#02	Howard, Robert		10/08/2020
01-#03	Miller, Torin	National Deer Alliance (NDA) and the Quality Deer Management Association (QDMA)	10/08/2020
01-#04	Sprinkle, Richard	Virginia Bear Hunters Association	10/08/2020
01-#05	McCormack, C.		10/08/2020
01-#06	Robertson, Tad		10/08/2020
01-#07	Posey, John		10/10/2020
01-#08	Angle, Jacob		10/11/2020
01-#09	Caul, Bert		10/14/2020
01-#10	Thacker, Wayne	Rocky Mountain Elk Foundation Virginia State Leadership Team	10/25/2020
01-#11	Feasel, Darrell		11/02/2020
01-#12	Davis, Kristin	Southern Environmental Law Center	11/02/2020
01-#13	Bamford, Sherman	Sierra Club, Virginia Chapter	11/04/2020
01-#14	Pratley, Tom		11/05/2020
01-#15	Reed, Ernie		11/05/2020
01-#16	Hypes, Rene		11/05/2020
01-#17	Krichbaum, PhD, Steven		11/05/2020
01-#18	Litton, William G.		10/29/2020

General

General - #1: These comments express support for the Potts Creek Vegetation Project.

01-#01-01 I'm very happy to see that plans are in place for these long overdue changes are going to begin. I know this area very well. [...] I agree with some timber harvesting and

thinning as this will certainly help all wildlife in the future. Thanks for allowing me to comment on these needed changes to this area.

01-#03-01 On behalf of the National Deer Alliance (NDA) and the Quality Deer Management Association (QDMA), I am writing to state our support for the proposed project [...] NDA and QDMA fully support the Forest Service's proposal to create early successional and late open canopy conditions to provide diverse habitats for wildlife through timber harvest, timber stand improvement, prescribed fire and creation of open and edge habitat. Through our extensive work on deer and habitat management across North America, we know that the actions proposed by the District will benefit wild deer by enhancing the varying habitat requirements, critical habitat components and ecosystem preferences of the region's fauna. [...] The Potts Creek area's white-tailed deer require varying habitat types and structures, and the proposal's inclusion of wildlife habitat enhancement measures such as encouraging regeneration of forests, managing non-native species and the planting of both soft and hard mast trees will create these necessary habitat variations.

01-#04-01 I support much more responsible proactive management in our National Forests which include controlled burns and timber harvest as long as done reasonably and under supervision. I support the wildlife clearings, I think there needs to be more clearings to promote new growth in our forests, these are the areas that provide the most new mast crops of both soft and hard mast plus areas for wildlife to raise their young. It is very obvious that a lot of planning and consideration has gone into the Potts Mountain project and the VBHA and myself personally strongly support this project.

01-#05-01 I also am in full support of the Potts Creek Vegetation Management project, as a landowner with property adjacent to the proposed burn area. [...] I appreciate this effort and would be glad to see it undertaken.

01-#05-01 I am excited to see habitat improvement plans in this area. I hunt in this area regularly and have seen population declination and this work to provide habitat diversity and edge will certainly help the situation.

01-#05-01 A very comprehensive and well documented management plan. Proactive forest management is vital to the success of our National Forest.

01-#08-01 The purposed project of the "Potts Creek Management Project" is a must needed. I have lived in this area now for 7 years permanently and have been part of this area my whole life and many of times I have heard comments from folks of the need for more burns and thinning. The purposed burning above the "Grade" is well needed. I live not far from this area and from hiking and hunting I have always notice many stands of dead overcrowded timber and very thick leaf litter which has the potential in my

opinion for a very chaotic wildfire. [...] I feel the project overall is very beneficial in the long term for the area.

01-#09-01 I fully support all the proposed work described in this project. [...] Hope you can see fit to try to add more brood habitat.

01-#10-01 The Rocky Mountain Elk Foundation (RMEF) Virginia State Leadership Team strongly supports the proposed Potts Creek Vegetation Management Project. This landscape scale project will augment the Lower Cowpasture efforts and benefit the District, forest, wildlife and a variety of forest users. The project includes numerous components which achieve the George Washington National Forest Plan intent. The proposed Potts Creek Project Vegetation Management Project will help restore badly needed age-class, structure and wildlife habitat diversity. Scoping Letter Table 8 points clearly to the need for active forest management to restore critical structure and habitat in the project area. The RMEF Virginia State Leadership Team strongly endorses the proposed prescribed burns and commercial timber harvests and other active management. We are particularly pleased to see the proposed ~500 acreage for early successional, regenerating young forests. Further, an age-class diverse forest with attending canopy structural diversity will help mitigate climate change.

01-#11-01 ... I would support any effort that creates a healthy forest habitat for Ruffed Grouse, American woodcock and other wildlife. I hope this project will create, enhance and protect early successional forest habitat. Early successional forest habitat also benefits other species such as deer, turkeys and over forty species of song birds that need early successional forest for survival.

01-#14-01 I am writing in support of the Potts Creek Vegetation Management Project. As a volunteer with the Ruffed Grouse Society, I am interested in the creation and maintenance of Early Successional Habitat for the benefit of wildlife that depend upon it. I believe the Oak regeneration treatments and the wildlife habitat enhancements (clearings and post-harvest plantings) will contribute to that type of habitat, in a project area lacking in it, according to analysis.

01-#16-01 According to a DCR ecologist, the mature table mountain pine forests in the vicinity of the Frozen Knob and Solomon's Run Barren Conservation Sites will benefit from the prescribed fire treatment.

01-#02-01 I think any improvements that can be made to the forests are a positive thing.

Response: *Thank you for your comment.*

General - #2: These comments were determined to be out of scope of this project.

01-#13-01 The Virginia Department of Game and Inland Fisheries (VDGIF) stated its position that the proposed riparian corridors in the draft revised Jefferson LRMP were not sufficient to protect threatened and endangered aquatic species. [...] Wider streamside buffers than those proposed here (EA 13&14) should have been considered and implemented.

01-#13-01 To comply with the Executive Order on Climate Change, the agency should take the following steps... "Sec. 5. Federal Agency Planning for Climate Change Related Risk. (a) Consistent with Executive Order 13514, agencies have developed Agency Adaptation Plans and provided them to CEQ and OMB. These plans evaluate the most significant climate change related risks to, and vulnerabilities in, agency operations and missions in both the short and long term, and outline actions that agencies will take to manage these risks and vulnerabilities. Building on these efforts, each agency shall develop or continue to develop, implement, and update comprehensive plans that integrate consideration of climate change into agency operations and overall mission objectives and submit those plans to CEQ and OMB for review.

Response: *The comments above address issues that are beyond the scope of the proposal.*

NEPA

NEPA - #1: The Forest Service should analyze additional alternatives to the proposed action, including an alternative that excludes logging.

01-#13-01 The NEPA document must meet NEPA's requirements that a reasonable range of alternatives be fully analyzed. [...] The FS should consider no-logging alternatives that provide economic benefits and amenity values, recreation, and other resources (clean water, clean area, etc). Studies have shown that on national forests, these values and resources provide many times the economic benefits of logging.

Response: *We are required by the National Environmental Policy Act (NEPA) to explore and evaluate reasonable alternatives to the proposed action when there are "unresolved conflicts concerning alternative uses of natural resources." In our analysis, we have not identified any such conflicts.*

Although we are not required to analyze a "No Action" alternative for an Environmental Assessment (EA), this alternative was considered in the Potts Creek project. The consideration of a "No Action" alternative is only a requirement for an Environmental Impact statement (EIS). Forest Service Handbook direction states at FSH 1909.15 – Ch. 10 § 14.2 that "The EA may document consideration of a no-action alternative through the effects analysis by contrasting the impacts of the

proposed action and any alternatives(s) with the current condition and expected future condition if the proposed action were not implemented. (36 CFR 220.7(b)(2)(ii) ”.

Public comments that describe issues of concern help us identify alternatives, although we are not required to analyze these alternatives in detail provided that we briefly discuss the reasons for dismissal from analysis. These could include: that it does not respond to the project purpose and need; it is duplicative of the alternatives considered in detail; or it does not conform to existing law, regulation, or policy such as the 2014 Revised Land and Resource Management Plan for the George Washington National Forest (referred to as the Forest Plan) (Forest Service, 2014a). A list of the alternatives eliminated from detailed study is included in the Alternatives section of the EA (Forest Service, 2020) under the heading Alternatives Considered but Eliminated from Detailed Study. We identified no other reasonable alternatives that would adequately address the purpose and need.

NEPA - #2: The Forest Service should analyze for cumulative effects within the project area.

01-#15-01 All of the aforementioned issues are intensified in scope in increasing the cumulative effects on the entire forest and GWNF in particular. Cumulative effects analysis is an essential part of the EA/EIS process but should also be considered in the scoping notice for this project.

01-#13-01 The FS is required to consider cumulative effects. For this project, you must consider the cumulative effects of all past, present and foreseeable events and activities on adjacent lands in the vicinity of the PA and this watershed. [...] Consider the cumulative impacts of cutting units in adjacent timber sales and other adjacent areas, including those on private land.

01-#13-01 One of the most important pieces of information regarding the project area is the history of past management. Data from these projects including biological inventories, road building and improvements, past logging, past burning, project monitoring and economic data, should be readily available to the public. Including this data with scoping notices would fulfill your responsibility to provide sufficient information for the public to be able to generate responsible and pertinent information on the proposed project.

Response: *Cumulative effects analysis is included in Chapter 3 of the EA.*

NEPA- #3: The Forest Service should establish a clear purpose and need for the proposed activities, specifically with regard to early successional habitat, and provide clarification on the ecological departure analysis used to determine such need.

- 01-#17-01 The need for this project is not established. All we have is vague generic boilerplate language that could be applied anywhere - no site specificity [...] How your purported need was determined at each specific proposed site is not apparent.
- 01-#13-01 The project and other activities/events may contribute to ESH habitat and other vegetative characteristics. To what degree do past and/or already-approved activities on nearby public and private lands already provide a dispersed system of forest openings, stands of varying ages, and the other desired future conditions? Evaluate whether there is a need for this project based on activities and events taking place in the vicinity of the PA.
- 01-#13-01 Information regarding areas which have experienced natural disturbances during the past few decades is also vitally important. FS analysis of early successional habitat (ESH) regularly excludes such information, giving the mistaken illusion that the only impacts to the forest that create ESH are the result of management practices.
- 01-#13-01 The FS should analyze whether within-stand ESH (of any size) and grass/forb habitat (of any size) exists or is occurring as a result of natural disturbance or other activities and events. These natural disturbances, etc. may already have created adequate ESH or grass/forb habitat in the PA to meet DFCs or to serve as wildlife habitat. Is there a need for this project?
- 01-#17-01 In the past, the multiple pages given by the agency planners to “ecological departure” were unintelligible (see, *e.g.*, North Shenandoah Mountain timber sale project). References to a “natural range of variability” were made, but in the tables under NRV all we had was a single number. [...] how are these NRV numbers derived, and what is their relevance to this specific proposal? Where were the NRV numbers derived and by whom? What is the site specificity for the NRV numbers in the scoping letter? Were the models actually derived from on-the-ground conditions at this project area? And more importantly, where do the numbers in the tables for current condition come from? Who obtained the data? How? Where on this project area were they obtained?
- 01-#13-01 When natural disturbances, not limited to wind-throw, fire, ice storms, insect predation and slope failures are considered, the project area will be found to contain much more ESH than estimated. Furthermore, as you are required to undertake landscape analysis both within and adjacent to the project area, those areas that are habituated, cleared, developed and managed should be included in any landscape analysis for determination of ESH. It is also of note that there is no credible data to my knowledge that supports any ideology that says there is an optimal % of ESH in the forest. The failure of the Forest Plan to recognize this is a major flaw, given that this is given as justification for the project.

Response: *The ecological departure analysis considered cumulative impacts of past activities and natural disturbances in calculation of early successional habitat on National Forest Systems, including prescribed fire and wildfire activities. Canopy gap imagery, along with field observations from district staff, were utilized to identify potential areas of disturbance. This information was combined with FSVeg data layers to establish the existing conditions for the ecological departure analysis. Please refer to the Major Forest Communities analysis in Chapter 3 of the EA for additional information.*

NEPA - #4: **The Forest Service should provide for public review the complete analysis for effects to social, physical and biological resources.**

01-#13-01 The scoping letter/map don't disclose the most basic info — such as which numbered stands are where on the map or the sites of roads and dozer lines. The compartment stands are not numbered on the map, again making comments on specific sites difficult.

01-#13-01 We request copies of the biological evaluation, economic analysis, roads analysis, old growth surveys, monitoring records for special biological and Natural Heritage-identified areas in the area, and watershed assessments for priority watersheds in the area, as soon as they come available.

Response: *The draft EA includes effects analysis to biological, physical and social resources. Maps provided with the draft EA include numbered units, as well as the locations of temporary roads and dozer lines.*

Prescribed Fire

Fire - #1: **The Forest Service should ensure that prescribed fires are managed to prevent damage to private property.**

01-#05-02 [...] I hope that continued diligence is taken to protect adjacent and private property prior to the prescribed burn activities. This is not to detract from my support, but rather to voice continued caution as many homes and families lie very close to the forest.

Response: *Public and Firefighter safety is always the first objective for controlled burns, with the protection of adjacent private property being a top priority. The controlled burn will be conducted by Fire Specialists that have many years of prescribed fire experience. The burn plan will specify parameters for weather, fuel conditions, and number and type of personnel and equipment that will be needed to perform the controlled burn in a safe manner. Control lines will consist of man-made and natural barriers including: roads, trails, streams, dozer lines, and handlines. These control lines will be prepared before the controlled burn begins to reduce the chance of the burn leaving the burn unit. Preparations will include brushing flammable vegetation*

away from the lines, removing dead trees (snags) that pose a threat, and clearing lines of leaf litter. The controlled burn will be staffed with the appropriate number of qualified personnel and equipment for the unit size and may be supplemented by additional resources as needed to ensure the controlled burn stays within the project area.

Fire - #2: The Forest Service should ensure that prescribed fires are managed to prevent damage to sensitive wildlife species such as ground-nesting birds.

01-#01-02 One concern I have would be in regards to the prescribed burns. I hope that this will not be done during late spring or early summer as ground nesting birds such as grouse and turkeys are nesting during this time. With both of these species numbers at record lows, we need as many nest to survive as possible.

Response: *Research shows that declines in populations of ground-nesting birds such as wild turkey are primarily a result of poor habitat that is not actively managed. Prescribed fire greatly improves nesting and brood-rearing habitat for ground-nesting birds such as grouse and turkey. While a small number of nests may be lost directly because of springtime burns, improved habitat conditions created by prescribed fire may result in population-wide benefits and overall gains in productivity by increasing the vegetative structure and diversity needed for brood survival.*

Vegetation Management

Veg - #1: The Forest Service should avoid management in areas with mature forest or which meet the criteria for existing old growth.

01-#12-01 We also urge the Forest Service to commit to preserving all old growth in the project area, including any old growth identified through field surveys prior to project implementation. Old growth communities “are rare or largely absent” in Southeastern forests, perhaps occupying about one half of one percent (0.5%) of the total forest acreage.³ For that reason, the agency is making efforts to address the restoration of old growth, which is a “missing portion of the southern forest ecosystems.”⁴ If the Forest Service does propose logging old growth, this would be a significant impact, necessitating an environmental impact statement for the project.

01-#15-01 The project area contains significant areas of old growth forest as specified by the Virginia Department of Natural Heritage, specifically on the eastern slope of Peters Mountain and in the vicinity of Frozen Knob and Morning Knob. Old growth surveys are critical to assessing the potential impacts of this project on old growth resources. A site visit on November 2, 2020 found evidence of old growth north and west and northeast of FR3020 and above Rt 350 below and around Frozen Knob where logging and burning are planned. Evidence of old growth was also noted below Morning Knob

above FR608 and the unidentified roadbed north of FR608 noted on the scoping map. The area there planned for thinning and regeneration logging also show evidence of old growth. These and any other areas that contain old growth should be excluded from any management for this project and dropped from the project area. Roadbuilding, logging and the impacts of logging equipment on the ground will impact them significantly. True old growth is the rarest forest type in the GWNF and the project area contains portions of the largest block of old growth in the forest. It should be the job of the Forest Service to protect it across the forest, despite what management prescription the forest plan may have placed on it in error.

- 01-#15-01 All of the area above Rt 350 contains significant areas of what I would describe as potential old growth—areas containing trees of age greater than 100 years and where the vegetation is beginning to demonstrate characteristics of old growth. These areas should be maintained as such in this important area of Peters Mountain.
- 01-#13-01 There is a potential for the project to impact large-, medium- and small-sized old growth tracts in these working groups. Logging is proposed on two to three sides of old growth tracts identified in the GWNF Plan map “Existing Patches Old Growth Using Region 8 Guidelines” – including the tract east of High Point and immediately south of Rt 617 (even-age logging is proposed on all FS tracts surrounding this old growth tract). Late open block logging is proposed on nearly all FS tracts surrounding the old growth stand due south of Frozen Knob. Even-age logging is proposed on multiple sides around the old growth tract near Rt 3020. And again, because new road locations are not shown, there may be additional impacts from roads.
- 01-#13-01 As part of this analysis, the Decisionmakers should identify all old growth of any size (including within-stand old growth and old growth partially within multiple stands). Old growth components and old growth habitat value of all old growth of any size should be adequately protected. The FS should protect mature forest adjacent to or near existing old growth may be important ecological components that should be protected, as well. Potential fragmentation in and around old growth tracts should be analyzed. The FS should provide figures on the size, distribution, and age of trees to be cut. The FS should disclose the impacts on old growth and disclose whether the treatments could preclude or delay the attainment of old growth status. The agency should examine whether there is any within-stand patches of OG or relic trees that should be protected or buffered from disturbance. [...] The agency should examine the spatial arrangement of OG and surrounding mid- late-successional habitat, to determine whether any such areas should be protected or buffered from disturbance. Even if these areas did not meet operational criteria for old growth, given the obvious shortage of old growth in this area (and throughout the Appalachians) the FS should also consider designating some of the best areas as small, medium or large old growth tracts.

- 01-#13-01 Old growth should be surveyed and avoided. The FS should carefully examine the configuration and old growth forest types of old growth to avoid fragmenting large and medium sized old growth tracts and significant and large/medium sized mature forest/old growth tracts. The FS must avoid logging rare or underrepresented old growth forest types and higher elevation old growth forest.
- 01-#13-01 The Forest Service should disclose whether mature cove forests and old growth cove forests are underrepresented in this watershed, this district or this forest. How would cutting these stands would preclude attainment of future old growth status?
- 01-#13-01 The FS should examine whether potential old growth or large or old trees are found in the area; if these characteristics are lacking, the FS should examine methods that make up for this lack of old growth and large or old trees (see also below regarding old growth in the Appalachians). The FS should disclose whether there is an adequate old growth/mature forest/ and large tree component in this PA. The FS should analyze how the project may affect these components and the species that utilize them or depend on them.
- 01-#13-01 What old growth exists in the project area and vicinity? Does adequate old growth exist in the project area to ensure the viability of old growth dependent species? What large, medium, or small tracts of old growth exists in the project area and vicinity? What mature forest tracts adjacent to (or in the vicinity of) old growth exist in the project area and vicinity? What potential old growth that will achieve old growth status in the coming years exists in the project area and vicinity? How do fragmented ownership patterns, motorized access, other access, past logging, and other factors affect the quality of old growth in the project area and vicinity? How would the project diminish the quality of old growth or affect the size and distribution of large, medium and small sized old growth patches or potential old growth patches. The FS should follow regional old growth guidance for the project area/ and vicinity and the GW&JNFs as a whole. The FS should protect adequate old growth and mature forest habitat to ensure viable populations of MISs, NTMBs, salamanders, aquatic species, and PTESLR species and other key species that use old growth and/or mature forest in the project area. The FS should determine what actual old growth levels are in the project area, vicinity and the GW&JNFs as a whole, through surveying; if old growth levels are inadequate, additional old growth or potential old growth 11(if actual old growth is unavailable) should be protected from logging and roadbuilding.

Response: *Pursuant to Forest Wide Standard FW-85, an inventory was conducted on all stands proposed for harvest, as well as the temporary road locations, for existing old growth conditions. The results of the survey yielded that portions of Harvest Unit #s 19, 21, 30, and 47 contain patches that met the operational criteria for old growth types 21. These patches have been identified as protected areas to be excluded from harvest.*

Please refer to the old growth analysis in the EA for additional information.

Veg- #2: The Forest Service should take precautions to protect rare and sensitive resources within the project area.

01-#16-01 According to the information in our files, there are numerous natural heritage resources in the project area including significant communities and caves as well as rare plants and animals (see attached Table 1). DCR recommends avoiding construction of “watering holes” “wildlife clearings” and temporary roads in and near existing special management areas and significant natural community occurrences (i.e. Frozen Knob and Solomon’s Run Barrens).

01-#13-01 There are several special biological area, Division of Natural Heritage identified conservation sites and other areas of unique habitat within the project area (SN, Maps). The FS should ensure the public that activities (including proposed logging, burning at foreseeable intensities, roadbuilding, skid trail construction, dozer lines, and other infrastructure) are consistent with Virginia Natural Heritage recommendations for these areas. The FS should ensure the public that activities will not adversely impact the biological resources, aquatic resources, and other resources found within and around these special biological areas.

01-#13-01 The FS should analyze the degree to which deer populations could increase in this area and browse upon and negatively impact rare and important herbaceous plants found in this area

01-#13-01 The rock skullcap (*Scutellaria saxatilis*) was found in the project area, (See Toms Branch from this Ranger District (EA 43 & BE 7&8). The FS should completely and properly inventory the project area for all populations of rock skullcap or for potential habitat for this species. The FS should adequately disclose impacts to rock skullcap in compliance with NEPA. Rock skullcap has not been properly analyzed or protected. [...] The FS should protect rock skullcap habitat, large rocks/boulders, or rich, dry to mesic ridgetop woods from burning, fireline construction and other activities that may adversely impact the plant.

01-#13-01 Known populations of northeastern bullrush exist nearby (eg, Potts Pond, VDNH Nat. Her. Tech. Rpt. 96-14 Pp. 211-216) and other locations in this county and watershed (eg, Morning Knob '01-'03 M&E Rpt G-72 and Peters Mtn North VDNH Nat. Her. Tech. Rpt. 00-10 pp. 74-76). [...] The agency must formally consult with the USFWS on this specific project regarding endangered species. 16 USC 1536(a)(2). [...] the FS should inventory the project area to determine if northeastern bullrush populations or habitat may exist in the area. The FS should have determined if any shallow sinkhole ponds or sandstone depression ponds exist in the area ('01-'03 M&E Rpt G-72).

Response: *Through cooperative agreements between the Forest and VDNH and WVNHP, Special Biological Areas (SBA's) have been identified and delineated on the Forest. These include rare and significant natural communities and vegetative types, and reflect current knowledge of the location, management, and protection needs of rare species and associated significant natural communities on the Forest. These areas are identified in the George Washington Forest Plan as Management Prescriptions 4B- Research Natural Areas, 4C1-Geologic Areas, 4D-Botanical -Zoological Areas (Special Biological Areas) and in a supplemental report from VDNH, dated July 2000, which identifies additional areas for consideration as SBA's.*

Field surveys of proposed active management areas for TES species and their habitats were performed, including field surveys of project area SBAs by VA DCR staff to update known occurrences. Areas of special habitats were identified and would be avoided or buffered from management activities. Based on proposed active management locations, it was determined that no SBAs would be affected. While prescribed fire is proposed within the Potts Pond SBA boundary, control lines would exclude the pond and immediate surrounding area. Within the SBA, hand-ignition would be utilized, including minimal use of drip torches or other non-chemical means of ignition in sensitive areas.

Veg- #3: The Forest Service should provide additional clarification on proposed timber harvest methods and their consistency with the 2014 Revised Land and Resource Management Plan for the George Washington National Forest.

01-#13-01 The FS introduces a new logging method (“late open block” logging) that is not clearly defined in the SN and that we are not familiar with (SN). To our knowledge, it has not been used in any other timber sale. The logging method is not mentioned as one of the silvicultural methods in the GWNF Timber Analysis (GWNF Plan Appx C (Table C-5), nor is it defined in the GWNF Plan. [...] In addition, it is not clear whether the logging/burning combination would create even-age, two-age or uneven-age stand conditions (GWNF Plan Appx C). The FS should tell us whether the Forest Plan should be amended (with analysis) before this new logging method is permitted. Moreover, the FS should analyze whether this logging method would create more even-age age logged stands and more early successional habitat than disclosed.

01-#17-01 What exactly is “late open block” logging ? This is a new and vague method the results of which are not clear. Is this even legal; where is it described and analysed in the Forest Plan/FEIS ?

01-#13-01 The scoping notice contains inadequate information on logging methods, provision of residual trees, and other aspects of the proposed cutting. The volume, size, and species distribution proposed for logging should be thoroughly delineated. Further, the size,

species, age, and spatial distribution proposed to remain following logging should be disclosed

Response: *The Forest Plan describes the desired conditions for structural diversity across ecosystem groups, including for Mid-Successional and Late Successional Open Canopy Forest (pages 2-13 through 2-17). The proposed action includes late open treatments intended to establish open woodland conditions through a combination of thinning and prescribed fire. As described in the Forest Plan, open woodlands combine elements of both early and mid-to-late successional forest. Open woodlands are created and maintained largely by periodic fire disturbance regimes and characterized by an overstory of trees that are spaced far enough apart to allow sunlight to reach the forest floor. This structural condition allows the development of a grassy/shrubby/herbaceous/woody understory more typical of early successional forest and grassland/shrublands. Canopy openings range from individual or multiple tree gaps to widely spaced trees with open-grown crowns.*

As described in the Forest Plan, commercial timber sales are an effective method for creating open woodland settings and forest structural diversity. To create the desired late open structure as outlined in the purpose and need, units would be thinned to a residual basal area of approximately 40 square feet per acre, favoring the retention of large, fire-adapted tree species with longer lifespans. These units would then be treated with recurrent prescribed burn treatments to achieve the desired conditions, mainly to maintain the open canopy structure and promote the recruitment of an herbaceous and shrub layer. Please refer to the Major Forest Communities section of the EA for additional information.

Veg - #4: The Forest Service should anticipate the threat from non-native invasive species (NNIS) within the project area and take appropriate measures to mitigate their potential impact.

01-#13-01 Invasive species are found in the project area (SN 7). The FS should analyze the potential for this logging project to open up habitat and create conditions for the introduction and spread of invasives. [...] The FS should consider the full impacts of invasive plants in this area, the degree to which projects such as this one (by itself and cumulatively) will contribute to the spread of invasive plants. The FS has not demonstrated that the mitigation measures effectively eliminate the causes of noxious weed spread. logging, roadbuilding, and skid trail use and heavy vehicle traffic spread existing weeds, and probably introduce new species of weeds. The Forest Service should consider all reasonable measures that could reduce the potential spread of noxious weeds. Failure to consider strong mitigation measures violates NEPA requirements to minimize adverse effects.

01-#13-01 infestations on the roads readily expand into cutting units, especially the more intensive the logging done in the particular units [...] a genuine prevention strategy is need and this needs to be incorporated into the analysis.

01-#13-01 The FS should consider preventive measures, including foregoing or greatly reducing the footprint of this project, in order to better address the problem of invasive plants. The EA or EIS for this project should address the potential spread of invasives (& noxious weeds) from the activities proposed as part of this project.

01-#15-01 Roads, logging, burning and other proposed management activities are vectors for introduction of invasive species to the areas. The impacts of invasives on old growth and potential old growth areas is significant and potentially irreversible. These impacts must be considered and should be eliminated from the project area.

01-#16-01 DCR recommends an invasive management plan be developed and implemented for the project, as ground disturbance associated with the proposed activities will increase the likelihood of invasion of non-native species. DCR recommends focusing “non-native invasive species treatment” in and around special management areas and significant natural community occurrences (i.e. Frozen Knob and Solomon’s Run Barrens) and in areas where temporary road construction is unavoidable.

Response: *National Forest System lands, like neighboring private lands, are increasingly susceptible to NNIS. The Forest Service is committed to controlling NNIS, including reconnaissance, integrated treatments (chemical, mechanical, cultural and combinations) and monitoring to judge the effectiveness of treatments. While complete eradication of NNIS populations is not feasible in many cases, the agency is committed to not allowing these plants to curtail productivity or threaten important habitats on public lands or displace native species in large numbers.*

NNIS treatments will tier to the Forest-Wide Non-Native Invasive Plant Control EA. Ongoing NNIS treatment would be implemented along with the proposed vegetation treatments as needed. NNIS seed sources are prevalent throughout the forest and take advantage of any openings, whether caused by timber harvest or natural disturbances such as wildfire, wind, or insect and disease. However, active management, including the systematic reconnaissance of treatment units and surrounding areas, will allow for identification and control measures on populations that would have likely gone undetected. Pre- and post-monitoring of treatment areas may allow for existing NNIS infestations to be reduced and any new small populations to be eradicated.

Harvesting activities will likely allow the agency leverage funding opportunities for widespread control measures through vehicles such as the Knutsen-Vandenburg Act (KV) funds and use of stewardship contracting. Robust monitoring will occur and will be scheduled in the Forest Service’s Forest Activity Tracking System (FACTS) database

to insure follow-up. Please refer to the Major Forest Communities and Non-native Invasive Plant Species sections of the EA for more information

Wildlife

Wildlife - #1: The Forest Service should address the issue of forest fragmentation in its effects analysis.

01-#13-01 The issue of forest fragmentation and fragmentation of old growth and mature forest habitat should be considered. [...] The forecasted cutting will undoubtedly result in more Deer (a well-known indicator species for fish and forest fragmentation).

01-#13-01 Since this is a large-scale project, covering over 35,000 acres, the Forest Service should ensure that large blocks of remote habitat and linkages between remote habitat blocks are protected. [...] The Forest Service should analyze the effects of the project with regard to habitat fragmentation, loss and degradation and in converting forests to agricultural uses.

01-#13-01 Private lands are not providing and cannot provide the needed large tracts of undisturbed, unfragmented forests that public lands provide. How do the proposals for the TS provide for that which cannot be provided for on private land? (i.e. undisturbed, unfragmented habitat)?

01-#13-01 There has been recent cutting in this PA and more cutting is proposed; this could impact forest fragmentation on a number of levels. Please consider all known and reasonably anticipated effects of forest fragmentation on native biodiversity, interior dependent species, exotic species invasion, seed drift, temperature change through increased sunlight, and deer browse.

Response: *Edge habitat is considered an important habitat for numerous game and non-game wildlife species as well as many plant species in the project area. Fragmentation and the resulting edge habitat can cause a change in the plant and animal communities within the new habitats and ecotones between habitats. For some species, this habitat change will be a net increase in suitability and other species the opposite. In addition the resulting change may occur on a small spatial scale (ie silviculturally treated forest stand) or throughout a larger scale (ie 2500 acres prescribed burn). Habitat changes and "fragmentation" can last various time scales from the permanent building of roads and resulting edge, to the temporary setback of forest succession through stand removal, shelterwood treatments, or even low volume thinning.*

Fragmentation is most commonly associated with the permanent conversions of forest conditions. Most of the proposed activities which provide early successional forest conditions and associated edge are temporary. Ten years after a natural or managed

disturbance, forests mature into saplings and poles. At approximately 40 years of age, forests are considered mid successional, with late successional habitat appearing at 70-120 years of age depending on forest community type. Managing extensively forested landscapes at a variety of scales and through a variety of regeneration methods can provide suitable habitat for species that need large unbroken forest habitats and species that need forest edges and early successional habitat. Please refer to the Successional Forests and Associated Management Indicator and Demand Species section and the Major Forest Communities section of the Draft EA for additional information.

Wildlife - #2: The Forest Service should provide for public review the complete analysis for effects to Indiana Bat, Northern long-eared bat, and any other threatened or endangered bat species and their habitat.

01-#16-01[...] there is potential for the little brown bat (*Myotis lucifugus*), the Northern long-eared bat (*Myotis septentrionalis*) and /or the tri-colored bat (*Perimyotis subflavus*) to occur within the project area. Therefore, DCR recommends coordination with USFWS and the VDWR, Virginia's regulatory authority for the management and protection of these species to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

01-#16-01 According to the DCR-Karst Program, many of the caves that have been surveyed so far within the footprint of this project area may be suitable for use by Tri-colored Bat as hibernation sites in the wintertime and swarming sites at other times of the year. This species is very likely to be encountered on the landscape of this project and should be taken into account.

01-#16-01[...] suitable habitat does exist for multiple bat species within the project area and current data is limited. DCR recommends that the USFS take potential impacts to bats into account for all management decisions that may be considered.

01-#13-01 Because the project area and project is so close where TESLR bats have been observed roosting in trees in the Forest, the FS should determine and disclose the distance of the project from the cave and other roost sites, & properly analyze effects.

01-#13-01 The FS should follow the guidelines of the Indiana Bat Plan Amendment EA. [...] This is especially important due to the closeby location of hibernacula. The requisite full, intensive, and competent surveys, inventories, and data gathering to ascertain use of this area by the Bats should be performed.

01-#13-01 The proposal does not accomplish the goals of the IBRS or ESA or NFMA (viability [36 CFR 219.19]). The clear potential for adversely affecting a threatened or endangered species is present. By failing to properly consider, provide for, or protect

the Indiana Bat and other T&ESLR bats, this proposal may violate the NFMA [36 CFR 219.19(a)(7)] in addition to the ESA. [...] If the FS does not perform the needed surveys and inventories of the area and its habitat (the proper site-specific good faith "hard look" by qualified personnel using valid methods) necessary for clearly establishing the status of the Bat here, it is clear the agency would not be placing the requisite highest priority on the Indiana Bat and other T&E bats and their habitat.

01-#13-01 The proposed logging would adversely effect roosting (sheltering), maternity (breeding), foraging (feeding), and swarming habitat of the Indiana Bat and other T&E bats. This timber sale could "take" the Indiana Bat and other T&E bats in that it could result in significant habitat modification or degradation, a violation of section 9 of the ESA. See also 40 CFR 1508.27(a&b), and 36 CFR 219.19. An unknown quantity of Bats may also be directly killed by implementation of the proposed logging.

01-#13-01 Of particular concern are cumulative impacts to the IB. [...]The agency's assertion that CIs will not result to the Bat's populations here or in Virginia must be explained & substantiated.

01-#13-01 Establishment of whether these units and project area are actual foraging areas is necessary so as to be consistent with the NEPA, NFMA, APA and/or the ESA. This is especially important due to the closeby location of a critical hibernaculum and the even closer occurrence record. The requisite full, intensive, and competent surveys, inventories, and data gathering to ascertain use of this area by the Bats must be performed.

01-#13-01 The FS must perform the requisite surveys using advanced methods to determine in the eastern small footed bat exists in the area. The project area contains rock outcrops. The FS should ensure that "buffers and minimal disturbance zones" were implemented or adequate. The should require the recommended " timber harvesting techniques that leave snags,and trees with cavities and exfoliating bark" be implemented as mitigation measures around these areas.

01-#13-01 The FS should analyze the particular habitat needs of the long-eared bat and should analyze how the project would impact the bat and its habitat. Surveys should be conducted for the bat (and other PTESLR bats).

Response: *The findings of the Biological Evaluation (BE) and consideration of threatened, endangered and sensitive species are summarized in Chapter 3 of the EA.*

Wildlife - #3: The Forest Service should provide for public review the complete analysis for effects to salamanders and their habitat.

01-#13-01 At least one species of salamander exists in the project area (SN6) as may others. The Forest Service should sufficiently examine and consider the potential impacts upon salamanders. [...] If this PA contains tiger salamander habitat or other MIS or TESLR salamander habitat, the FS should examine impacts in full. If this project area or the cutting units do not contain Cow Knob or tiger salamander habitat, then the MIS (viz., black bears, pileated woodpeckers) and other birds listed in the GWNF Plan 2-9 are of limited, even misleading, use for gauging impacts to site-sensitive salamander populations. Additional salamander/amphibian/reptile MIS need to be considered in this analysis. [...] It is apparent that the proposed operations have the potential to significantly harm the habitat of and thereby the distribution and viability of some salamander species. This issue should be fully and fairly considered by the agency here.

01-#13-01 How has salamander habitat been affected by past projects? How will such habitat be affected here? How were salamanders affected? How would the project affect sites associated with water, food-gathering, breeding, mating sites or other important life-cycle sites for salamanders, other amphibians, other riparian-dependent, or aquatic species? How will the project affect these species? How will movement between populations be affected? How will interactions between certain salamander species and their competitors be affected?

Response: *There are no known occurrences of sensitive amphibians located on the James River Warm Springs Ranger District. The findings of the Biological Evaluation (BE) and consideration of threatened, endangered and sensitive species are summarized in Chapter 3 of the EA.*

Wildlife - #4: The Forest Service should provide for public review the complete analysis for effects to black bear and other management indicator species (MIS).

01-#13-01 **Black bear** is an MIS here and throughout the GWNF (GNWF Plan MIS List). Issues of negative impacts to the MIS black bear due to increased disturbance, stress, vulnerability which the project could foreseeably facilitate should receive a hard look. See also 36 CFR 219.19(a)(4). [...]The potential clearly exists for significant impacts to black bear viability here. There must be hard inventory and population data for this MIS to provide an accurate picture. [...] Hollow trees, existing stumps, snags, shallow holes, and rock outcrops are potential bear den sites. These must be protected from logging. There must be analysis of the loss of interior and remote habitat that will occur and has already occurred here The road density, when both legally and illegally used motor routes are considered, may be in excess of that found to be desirable for

bears. (there is little info in the SN) And the affects of miles of nearby access roads. must be properly analyzed.

01-#13-01 Trees of sufficient size for bears to den are old large trees. Yet the agency's action would remove these key elements, habitat significant to viability. The analysis must fully and fairly consider this factor.

01-#13-01 Appropriate management indicator species (MIS) should be selected to evaluate the impacts of this project on wildlife. [...] The Forest Service should adopt management indicator species that truly represent a full range of the habitats and niches found on the Forest.

Response: *Please refer to the Management Indicator Species analysis in Chapter 3 of the EA.*

Wildlife - #5: **The Forest Service should provide for public review the complete analysis for effects to cerulean warblers, migratory birds, and other avian species that exist within the project area.**

01-#13-01 There is a potential for the cerulean warbler to be found in the PA and vicinity. [...]The cerulean is recognized by the FS and others as an area-sensitive species. [...] The FS should consider the impacts to these area-sensitive species.

01-#13-01 The proposed logging, roadbuilding and associated activities could impact birds during the time that birds are seeking mates, breeding, nesting, rearing their young, or migrating. During what period due forest interior birds seek mates? Breed? Migrate? How would the project affect these factors? The project may involve a taking under the MBTA if birds are killed in nest trees or nearby trees

01-#13-01 The FS should properly & accurately disclose adverse impacts on migratory bird resources when conducting agency actions [...] ensure that environmental analyses of Federal actions required by the NEPA or other established environmental review processes evaluate the effects of actions and agency plans on migratory birds, with emphasis on species of concern [...] identify where unintentional take reasonably attributable to agency actions is having, or is likely to have, a measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. [...] Several birds listed in Bird Species of Conservation Concern (USF&WS) 2002 are potentially found in this area (see BSCC p. 51). Impacts to these NTMBs should be analyzed.

01-#13-01 Disclose the impacts of the project and similar projects on: neotropical migratory songbirds who utilize the area as a summer breeding ground, neotropical migratory songbirds who are faithful to certain sites or certain trees, forest interior birds, area sensitive birds, rare birds, bird species with certain habitat needs, common bird

species, generalists (birds), species of interior forest, area sensitive, (etc.) birds that are declining, species of birds whose populations are increasing and deep forest raptors and owls.

01-#13-01 Forest raptors are important predators and keystone species in forest ecosystems such as those proposed for logging in this PA. Their habitat may be replaced by the project. How will habitat for barred owls, other owls, Coopers hawks, and other forest raptors be affected in this area?

Response: *Please refer to the Management Indicator Species and TESLR analysis in Chapter 3 of the EA.*

Wildlife - #6: **The Forest Service should provide for public review the complete analysis for effects to freshwater mussels and any other threatened, endangered, or sensitive aquatic species and their habitat.**

01-#13-01 There may be occurrences of the roughhead shiner, a sensitive species in this county and watershed. [...] Given the presence of this very rare, sediment-sensitive species, the FS should have considered additional riparian zone/streamside zone protection. Roughhead shiner habitat could even potentially exist in the streams within the project area.

01-#13-01 If there are any class ii-v trout streams in or downstream from the project area these areas should be protected. This should be a high priority. Perennial, intermittent, and ephemeral tributaries of trout streams should also be considered because these play an important role in downstream water quality.

01-#13-01 How will the project impact TESLR mussels and other TESLR aquatic species?

01-#16-01[...] Potts Creek has been designated as a “Threatened and Endangered Species Water” by DWR for the James Spinymussel. Therefore, DCR recommends coordination with the U.S. Fish and Wildlife Service (USFWS) and Virginia's regulatory authority for the management and protection of this species, the VDWR, to ensure compliance with protected species legislation.

Response: *Please refer to the Fisheries and Aquatic Habitat, Soil, Water (Hydrology), and Threatened, Endangered, Sensitive, and Locally Rare Species sections of the EA.*

Wildlife - #7: **The Forest Service should consider impacts to wildlife habitat from the proposed action and prioritize rehabilitation of existing clearings.**

01-#01-01 There are many old wildlife clearings in this area have been allowed to go with no attention over the years. These could be redone with less work than building new ones.

01-#13-01 How will activities affect canopy, canopy structure, natural disturbance regimes, pit and mound topography, snags, wood debris on the forest floor and across streams?

01-#13-01 Consider how the project affects closed forested canopy, deep moist soil, abundant surface cover objects, late successional stages or oak and maple woodlands, hardwoods mixed with eastern hemlock, hemlock stands, cove hardwoods, mixed cove hardwood and conifer stands, tuliptree stands, and rhododendron thickets, stands at high elevations, and any species associated with these habitats or habitat components?

01-#13-01 How will this project impact remote habitat, black bear habitat, PTESLR species and MIS habitat and populations, mature/old growth habitat, interior forest habitat in the vicinity of the project.

Response: *Please refer to the Management Indicator Species analysis in Chapter 3 of the EA*

Water Quality

Water - #1: The Forest Service should provide for public review a complete analysis for effects to water quality.

01-#15-01 The Scoping Notice contains no information on watershed resources or conditions in the project area. This would include, but not be limited to, location of seeps, springs and ephemeral streams. This information is critical to creating a project that will not adversely impact these critical hydrologic resources. The project area on Peters Mountain contains no less than 14 separate stream-level watersheds, all of which have their headwaters in the project area. The area proposed for burning above FR5036 contains (coincidentally) also no less than 14 separate stream-level watersheds, all of which have their headwaters in the project area. This information should be generated prior to issuance of the scoping notice so that substantive comments can be generated by concerned members of the public.

01-#13-01 All portions of riparian areas need to be thoroughly delineated in the field. Impacts to plants, animals, and biological communities in and around these areas needs to be thoroughly evaluated. The management prescription area for riparian areas needs to be clearly delineated and followed in this project area. The document with the scoping notice did not contain maps of these areas. We would be happy to comment further once these maps are completed. It is unclear how riparian management areas, and stream conservation zones will be delineated. Many of the resources associated with these features (and the natural shade within them) may be impacted by this project. How would resources associated with large or old trees such as these be affected? How would LWD be affected?

- 01-#13-01 RxA 11 areas should be disclosed to the public or decisionmaker in maps or by any other means. Proper disclosure has not occurred; the FS cannot assure the public and decisionmaker that the Plan is being properly implemented.
- 01-#13-01 Vehicular use should be avoided in delineated riparian areas and so they will not be adversely affected. And road construction, reconstruction, or re-opening may occur in riparian areas. The precise location of all the project area riparian areas in relation to cutting units and road sites is not disclosed. The FS does not explain why the full riparian areas are not being fully protected. [...] Because of their importance (e.g., habitat, feeding fisheries, downstream TESLR species habitat) and the drier site conditions that can be found elsewhere at these units, all riparian areas should be avoided by cutting and vehicles.
- 01-#13-01 Vernal ponds and ridgetop ponds occur on this part of the James River RD. How will the project impact these?
- 01-#13-01 The Forest Service should examine this area closely to determine the presence of seeps, springs, wetland plants, and other features related to the hydrology of this area. The Forest Service should disclose the impact that logging in, and around this area will have on the stream systems and hydrological features within this area and downstream. The effects of sedimentation, alteration of water flows, removal of forest cover, change in water temperature, and other effects should be fully evaluated. Steep slopes, soils, variation in water flows and other variables should be considered. Virginia BMPs should be followed. Riparian corridors should be established of adequate sizes to protect the resources in and around the headwaters of streams. How would populations of James spinymussels and other mussels be affected? How will water quality downstream in Potts Creek and downstream be affected? How will water quality in impaired waterways, eligible wild and scenic rivers, eligible state scenic rivers, and important recreational rivers be affected? How would flooding and high water events be affected?
- 01-#13-01 The FS should document that adequate monitoring of streams has been conducted and will be conducted.
- 01-#13-01 Water quality: What effect will the project and other activities/events in the vicinity have on coarse particulate organic matter, fine particulate matter, algal abundance, temperature extremes, turbidity, nutrient input into streams, amount of suspended solids, stability of substrate and banks, uniformity of water depth, flow extremes, diversity of microhabitat velocities, abundance of shredders vs. scrapers, and abundance of omnivores vs. piscivores? Cumulative effects? What are the MAIS rankings for these areas? How good a predictor of water quality are these rankings?

01-#18-01 [...] the potential for runoff affecting streams that might impact family property and/or culverts or drain piping at road crossings on Mill Branch Road is a concern since streams overflowing the road is already an intermittent problem. Both gentleman I spoke with assured me that the plan for the Potts Mountain/Tom's Knob area is for a controlled burn of the underbrush, that no timber harvesting will occur, and that this would not result in increased traffic on the roads named nor would runoff be significantly affected.

Response: *Please refer to the Fisheries and Aquatic Habitat, Hydrology, and Soils sections in Chapter 3 of the EA.*

Geology

Geo - #1: The Forest Service should provide for public review the complete analysis for effects to geologic resources such as caves or other karst features.

01-#13-01 Please disclose whether this project could impact any cave or karst areas. There are caves and karst areas in this county and, likewise, there may be caves and/or limestone areas in the vicinity of the project area. How will these resources be impacted by the project?

01-#15-01 Much of the project area is in areas that are considered steep slopes and that have a history of slope failure. My site visit found that virtually all of the project area on Peters Mountain contains numerous areas of boulder fields, skree and talus slopes and other evidence of slope slippage. These areas need to be identified and avoided to minimize impacts in the project area.

01-#16-01 Based on the scoping notice information, most of the physical cave entrances within this project are located outside of the Forest Boundary but are in close proximity. Primary concerns in respect to cave and terrestrial cave invertebrate resources is direct disturbance of cave entrances, sedimentation and activities that may impact water quality or send sediment downstream of active work zones. Many caves may be recharged by land within the National Forest by both surface and subterranean water pathways.

01-#16-01 This project intersects the following karst layers: Karst Bedrock, DMME Sinkhole coverage, Spelaea Screen layers. It has also intersects the Arritt Jordan Cave Conservation Sites and the Paxton Cave Conservation Site. In total, the VSS database contains four caves that the VSS and the Virginia Cave Board have designated as Significant, an additional 21 caves fall within the shape provided. In all, 25 documented caves are within the boundary of the polygon provided for review. Encountering undocumented caves, additional sinkholes or other sensitive karst features in the large area submitted for review is very possible. In addition to the caves

within the site, other caves are in very close proximity to the area under review. Some of the most notable outside of the project footprint are located in the Alleghany Carters Cave Conservation Site and the Blue Spring Cave Conservation Site.

01-#16-01 Sinkholes mapped by the Virginia Department of Mines, Minerals, and Energy are present in the project area. Typically, additional, smaller unmapped sinkholes can also be present in the vicinity. [...] Filling or alteration of natural (pre-existing) sinkholes is discouraged, and designation of natural buffers around sinkholes is desirable.

Response: *Please refer to the geology analysis in Chapter 3 of the EA.*

Soils

Soils - #1: The Forest Service should provide for public review the complete analysis for effects to soils that considers steep slopes and soils specific to the project area.

01-#13-01 An examination of the topo map reveals that there are some steep slopes in the area and numerous streamside areas within the area. How will these areas be affected? As stated above, maps with topographical markings are not provided to the public in this scoping, so it is impossible to tell where the boundaries of proposed cutting units, streams, management prescription areas and other project-specific features are on the ground. How will the project affect steep slopes, erosive soils, soils where soil movement may occur, soils with compaction hazards, soils with puddling hazards, rocky soils, soils with equipment limitations, soils at risk of losing organic material, soils with low levels of organic material, and other sensitive soils along the creeks in this project areas and their tributaries? What portion of the units are on steep slopes? Identify these areas. Do not merely take an average of slope. Will the project affect poorly drained floodplain soils? Soil Productivity? How will this affect soils in the project area? Regional soil quality standards and best management practices must be followed in full.

01-#13-01 The Forest Service should evaluate the impact of the project on soils and watersheds, including potential for erosion, landslides and slumping, compaction, nutrient cycling, and impacts to sensitive soils and downstream resources.

01-#13-01 What effect have previous cutting units and roads had on soil productivity and water quality? This project could exacerbate problems or create new problems. What effect will these cutting units have?

Response: *Please refer to the Soils Analysis in Chapter 3 of the EA.*

Roads and Motorized Use

Roads and Motorized Use - #1: The Forest Service should consider the potential effects of illegal motorized use within the project area. Temporary roads, and other existing system roads of concern, should be gated to control access.

01-#02-02 I think the policy should be to keep The Grade, as well as the Sweet Road gated and locked year round. When these roads are open, poachers run rampant, litter (usually in the form of beer cans and bottles) appear immediately, and illegal firewood cutters show up. Please consider keeping these roads locked. Bear hunters cut the locks on the gates at both ends of The Grade this past August, and ran amok. Perhaps, when these projects are done, it would be possible to dig pits, and make dirt piles to ensure the area is permanently closed to vehicles.

01-#07-02 My only concern would be the Forest Service's plan on access to these new areas. As a land owner contiguous to the National Forest, I see power vehicles (e.g. 4-Wheelers) within the forest and we also see illegal timber harvests occurring. If these new areas become more accessible, they also may experience these activities. The access should be limited to foot traffic whenever possible.

01-#13-02 Please disclose whether illegal off-road use and ATV/ORV use is occurring in the area, the impacts on resources and non-motorized users, and whether proposed roads might increase illegal motorized use.

01-#13-02 Present roads and additional "temporary" and permanent road construction/reconstruction will facilitate entrance into an area by hunting groups and hounds. They will be able to more easily interfere in Bears' lives during chase season, kill season, and by illegal poaching. Poaching and other wildlife disturbing activities are not even mentioned. These relevant factors must be fully and fairly considered.

01-#13-02 How does existing Forest Service infrastructure (roads, old skid trails, openings) facilitate illegal use of the Forest by ATVs? Will skid trails, roads, or logging units in this project contribute to ATV use in any parts of the area? Does the Forest Service have the ability to adequately patrol the area, given the low funding levels for law enforcement?

01-#13-02 the FS should disclose how the TS, associated activities, and other activities/events in this PA and surrounding areas will affect potential poaching, illegal road use, litter problems, and noise.

Response: *Following completion of the proposed management activities, all landings, temporary road surfaces, and skid trails would be closed and revegetated with a non-invasive wildlife seed mixture. Berms, ditching, logging debris and slash deposition are some of the methods used to close temp roads and skid trails and help prevent illegal use, erosion, and resource damage.*

Roads and Motorized Use - #2: The Forest Service should consider the potential effects of increased truck traffic on specific roads within the project area.

01-#13-02 My extended family owns property bordering along the Potts Mountain/Tom's Knob portion of the project so we are understandably very interested in how this project might affect us by increasing traffic on Mill Branch Road and Potts Mountain Road (Sweet Springs Turnpike as it was historically known).

Response: *No timber operations are proposed within the vicinity of Mill Branch Road and Potts Mountain Road, and no associated traffic is expected on these roads based on the current proposed vegetation management activities. Please refer to the Roads Analysis in Chapter 3 of the EA for additional information.*

Roads and Motorized Use - #3: The Forest Service should provide for public review a complete analysis for impacts of roads in the project area, including proposed temporary roads and skid trails, as well as identification of roads for potential decommissioning.

01-#13-01 A number of roads in this area have been identified as roads that should potentially be closed due to environmental impacts, costs of upkeep, and other factors. [...] Responsible officials must review the road system on each National Forest and Grassland and identify the roads on lands under Forest Service jurisdiction that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails.

01-#15-01 A stated priority of the GWNF is to implement a methodical and system wide analysis of roads and to propose significant road decommissioning and closures as part of project development. There is no information of these in the scoping information. Please send this information as soon as it is available.

01-#13-01 The SN and associated maps are unclear about where these roads (and proposed dozer lines) are located. We request a map and further information about these roads and the impacts on resources in the area. [...] Please examine and disclose all effects of temporary roads, including impacts on hydrology, springs and seeps, streams, wildlife, geology, caves, motorized use, non-motorized and primitive backcountry users, invasive and non-native plants, native plants, cultural resources, and other key resources. Please disclose how long these roads will impact resources of concern.

01-#15-01 The scoping notice notes that approximately nine miles of temporary roads would be created and 10.2 miles of mechanical fuels treatment, 1.7 miles of new dozer line and 4.1 miles of restored dozer line. There is no information provided as to where those roads, lines or treatments are to be located. [...] Please send me information on the location of temporary roads, dozer lines, mechanical treatments and any additional roads analysis as soon as it is available.

01-#13-01 Has a roads analysis been completed for this project area or vicinity? If so, please send us a copy of the roads analysis as soon as it is complete.

01-#13-01 What conflicts with hunting, recreation, fishing, and wildlife do existing/planned roads create? Are road densities within plan limits in this analysis area? Do any roads warrant closure due to impacts, plan requirements, user conflicts or other considerations? Consider all of these issues in the transportation analysis/roads analysis for this NEPA document and roads analysis for this area. Conduct a roads analysis, and allow public comment, in order to determine whether any roads should be considered for decommissioning due to environmental impacts, fiscal costs of maintenance or other factors. Consider the impacts of roads on soils, native plants, invasive plants, disturbance sensitive wildlife, nonmotorized recreationists and other factors.

01-#13-01 How many miles of roads, skid roads and other access are associated with this sale and past FS activities? What are their impacts on wildlife, native plants, watersheds, soils, and other resources? No roads of any type should be built to access this sale.

01-#13-01 How many additional vehicles will pass down project area roads as a result of the TS? What impact will these additional vehicles have on water quality? What impact will the cutting of logging units have in addition to this new truck traffic? How will this affect recreation? Where will roads, skid trails, landings and other logging infrastructure be located?

01-#13-01 What will be the impacts of all infrastructure and access routes associated with the project, including landings, cable corridors, skid trails, haul roads, skid roads, etc.? Where will they be located and what resources will be impacted by them at these sites?

Response: *Please refer to the Roads Analysis in Chapter 3 of the EA.*

Potential Wilderness Areas (PWA)

PWA – #1: The Forest Service should provide for public review a complete analysis for effects to roadless areas or Potential Wilderness Areas or should avoid management in these areas.

01-#12-01 We are pleased that the scoping notice acknowledges the Potts Mountain Potential Wilderness Area (PWA) within the project area, clearly identifies management proposed within the PWA, and affirms that the EA will include analysis of any potential effects of the proposal on the PWA. We are glad the District is focusing on prescribed fire in this area and is no longer considering commercial timber harvest within the PWA (as was discussed previously in a pre-scoping field trip). [...] Importantly, based on our current understanding of the proposal, we do not believe this burn would affect the area's PWA characteristics and would not affect its status in any future PWA inventory. This is essential to avoid the need for an EIS.¹ Accordingly, the District must ensure and explicitly document in project documentation that the implemented prescribed fire would not affect the PWA characteristics and would not

disqualify the area from inventory and consideration in future PWA analysis (i.e., that the prescribed fire would not alter the undeveloped character of the PWA). [...]

01-#12-01 The logging and burning proposed here (much of it within, up to the boundaries, and surrounding old growth and adjacent mature forest tracts; much of it near or within the Potts Mountain potential wilderness area/Barbours Creek RARE II area) is of high concern.

01-#13-01 Would any roadless or unroaded areas in the vicinity of the project be impacted? How would roadless, unroaded, remote, or area sensitive habitat, recreational, watershed and other values be impacted? [...] The FS should identify all inventoried roadless areas, uninventoried roadless areas, and unroaded areas (as defined in RACR, the RACR FEIS or similar guidance) of any size, should identify the roadless characteristics of all of these areas, and should analyze the impacts of this project and other activities/events on these areas. The FS should analyze the impacts of the project on wilderness eligibility. The Forest Service should recognize and consider the unique ecological values associated with designated and de facto roadless areas within what is otherwise a heavily roaded and fragmented national forest system.

01-#13-01 Much of the project is proposed in the Potts Mountain Potential Wilderness Area and Barbours Creek RARE II area, an area that was first identified as a nearly 13,000 acre roadless area under the Forest Service's RARE II roadless area evaluation in the late 1970s. Because a large part of this unique area is immediately north of Barbours Creek wilderness and still retains its wildland character, it should be protected from logging, roadbuilding, and bulldozed fireline construction. (Including logging units proposed south of Rt. 616). This area should be managed consistent with the 2001 Roadless Area Conservation Rule and consistent with plan provisions for potential wilderness areas. In fact a large portion of the project area was designated "remote habitat" for wildlife like black bear for many years.

01-#13-01 What tracts of remote, roadless, unroaded, or relatively undeveloped wildlife habitat, interior forest habitat and mature/old growth habitat exists in the vicinity of the PA? If so, have these areas been properly inventoried as roadless? Protected from logging, roadbuilding and other activities that might affect roadless status? Been evaluated for potential wilderness?

01-#15-01 Most of the project area between R607/Rt 616 and FR5036 contains the Potts Creek Potential Wilderness Area. This area which is adjacent and north of the Barbours Creek Wilderness has been identified by the Forest Service as qualifying for future wilderness designation. Logging below Rt 616 would permanently remove this area from this designation. Management activities including dozer lines, mechanical treatments and burning will compromise the character of the landscape and similarly compromise the character of the landscape and its ability to qualify for wilderness designation. This area should be dropped from the project area.

01-#15-01 I do think any area that might be considered for a future wilderness area should be removed from any harvesting consideration or WVI Hazard Fuel Reduction lines.

01-#13-01 Logging these adjacent or marginal places will degrade the roadless/unroaded area's special ecological, recreational, and scenic values; the roadless area will in effect be diminished in size as visitors will have to retreat and further into the interior in order to escape "sights and sounds of civilization". This and other relevant impacts are not assessed by the planners. The cumulative effects of these actions are important and relevant.

Response: *The Forest Service initiated a Roadless Area Review and Evaluation (RARE) in 1972 to identify areas that could be considered for possible inclusion in the National Wilderness Preservation System. A second process known as RARE II was completed in 1979.*

During RARE II, the GWNF identified 14 roadless areas totaling about 168,000 acres. The roadless inventory was updated as part of the George Washington Forest Plan Revision in 1993, with a total of 27 roadless areas for a total of about 261,000 acres. The 2001 Roadless Area Conservation Rule (RACR) used the 1993 roadless inventory to identify the list of inventoried roadless areas (IRA) covered by the Rule. The RACR prohibited road construction and reconstruction in IRAs and outlined roadless area characteristics. IRAs are characterized as having an undeveloped character and are valued for many resource benefits including wildlife habitat, biological diversity, and dispersed recreation opportunities. The list of Inventoried Roadless Areas (not including wilderness or national scenic areas) now includes 24 areas for a total of about 242,000 acres.

During the George Washington Forest Plan Revision in 2014, the area inside of the Potts Creek project area was identified as a Potential Wilderness Area (PWA). PWA's were identified and evaluated during the development or revision of Forest Plans for administrative recommendation to Congress for wilderness designation. Reference 72 Federal Register 4478-4481 (Jan. 31, 2007) and Forest Service Handbook 1909.12-2007-1, Chapter 70 Wilderness Evaluation. The intent is to identify and evaluate all NFS lands that meet the definition of wilderness in section 2(c) of the 1964 Wilderness Act. There are two steps to this process: 1) conducting the inventory (based on the definition of wilderness); and 2) evaluating the areas in the inventory (based on capability, availability and need).

The Forest Plan revision process may produce an updated inventory of roadless, however, roadless areas identified after January 12, 2001 are not covered by the RACR. In effect, they represent new information, and the restrictions of the RACR do not apply except where they overlap with RACR inventoried roadless areas. Therefore, the Potts Creek PWA does not need to be managed consistent with the RACR, although an analysis of project impacts to wilderness characteristics is included in Chapter 3 of the EA.

Although portions of the Potts Creek project area was inventoried in the RARE II process, it has subsequently been superseded by other management guidance, including the 2001 Roadless Area Conservation Rule (RACR) and the Forest Plan revision potential wilderness evaluation process as outlined above. Portions of what was once identified in the RARE II process remained and have been maintained as part of the now Potts Creek PWA located to the south of

the project area. The other areas were excluded from the IRA and/or PWA due to road density and were primarily allocated to management prescription area (MPA) 13 – Mosaics of Habitat, with smaller portions of MPA's 7E1-Dispersed Recreation Areas (Unsuitable), 4C1- Geologic Areas, 4D- Special Biologic Areas, and 4D1- Key Natural Heritage Community Areas.

For an analysis of effects to potential wilderness areas within the Potts Creek project area, please refer to Chapter 3 of the EA.

Climate Change

Climate Change - #1: The Forest Service should analyze all processes implemented in this project for climate change impacts.

01-#15-01 All of the proposed management activities, individually and collectively, decrease the ability of the forest to sequester carbon. They, collectively and individually, directly release carbon to the atmosphere. Burning, logging, road building, utilizing fossil fuel burning equipment all contribute to the huge carbon footprint of this proposed project and should be mentioned in scoping and considered in any EA/EIS analysis.

01-#13-01 Among other measures, the Forest Service should plan for climate change by (1.) protecting core roadless areas, (2.) reducing forest fragmentation and (3.) decreasing and eliminating non-climate stresses such as logging and logging road/skid trail building.

01-#13-01 Any alternative selected by the Forest Service should be (1) informed by the most up-to-date science, including identification and designation of core areas, corridors, and analysis of the connectivity of the Forest with other lands, (2) include an audit of activities permitted in the project to ensure that activities do not increase carbon emissions and do not decrease carbon sequestration, (3) incorporate monitoring and adaptive management to ensure that if climate-related conditions or indicators are worse than expected, appropriate stronger measures will be applied here and elsewhere.

Response: *Please refer to the Potts Creek project carbon assessment.*

Pesticides

Pesticides - #1: The Forest Service should disclose what herbicides and biocides would be necessitated by this project.

01-#13-01 The FS should have also disclosed what herbicides and biocides would be necessitated by this project. Cumulative and connected actions should be analyzed.

Response: *Please refer to the Non-native Invasive Plant Species section in Chapter 3 of the EA.*

Recreation and Visuals

Rec and Visuals - #1: The Forest Service should consider effects to visuals and scenic resources and take steps to mitigate any potential negative effects on recreational uses.

01-#13-01 The viewshed of important visual corridors in the area should be protected. The FS should conduct a seen-area analysis of the project on these trails. The impact on aesthetics, trail corridors, potential camp spots, rest stops, water sources, interior-forest plant/wildlife viewing opportunities, dispersed/primitive recreation, opportunities to experience solitude, challenge, restfulness, spiritual values should be considered. The FS should consider the views of day hikers, backpackers and long-distance hikers who may prefer locations that are relatively pristine over areas that are heavily managed and choose such locations for hiking. The FS should determine what the hikers use the trail system, what type of experience such hikers seek, or whether this project and other activities of the FS are cumulatively impacting the trail experience.

01-#13-01 It is not clear how the Forest Service ensures that permitted activities in Low SIO areas (and other SIO areas) can and will be "shaped and blended to the extent practicable with the natural terrain" as required by NFMA. [...] the FS should demonstrate that in all areas where even-aged logging and clearcutting are permitted, such activities would be blended to the extent practical with the natural terrain and would not violate NFMA.

01-#13-01 Consider impacts to the entire primitive/dispersed recreational experience associated with the above. Consider impacts to users of trails. What values should be protected along trails and in viewsheds? What are existing conditions? Will the project result in a change in conditions or desired conditions? What values do trail users expect and desire? What kind of views? What values do hikers expect and desire? What kind of views?

01-#13-01 How will the project affect recreation sites? How will views be affected? Will people be more or less encouraged to go for a hike, fish, or experience nature? Will people get an artificial view of how nature works? Do any natural disturbance areas exist in these areas? Why is logging necessary, esp. near campgrounds?

Response: *Please refer to the Visual and Scenic and Recreation resources analysis in Chapter 3 of the EA.*

Rec and Visuals - #2: The Forest Service should consider potential impacts of the proposed Allegheny Trail addition to ensure recreational opportunities and scenic integrity is maintained.

01-#13-01 Why is the SN proposing to route the trail to a road (road walk) when earlier planning maps showed the trail routed through the interior of this area on the mountain crest? Why is extensive logging proposed in and around the new trail corridor proposed in this SN? How will the proposed new trail corridor and surrounding logging and other activities affect aesthetics, trail corridors, potential camp spots, rest stops, water sources, interior-forest plant/wildlife viewing opportunities, dispersed/primitive recreation, opportunities to experience solitude, challenge, restfulness, spiritual values? This project may lead to increased ATV use on the trail or on other recreation resources. The WVSTA has found that ATV use of the ALT was “a potential problem in some areas.” (Records of the 8-22-92 ALT meeting, file 2340) How will these issues be considered?

01-#13-01 I am particularly concerned about the harm to the Allegheny Trail and the experience when hiking on it from implementation of the proposed actions. Why are you proposing to route the Trail to a road (road walk) when earlier planning maps showed the Trail routed through the interior of this area on the mountain crest? Why is extensive logging proposed in and around the new Trail corridor? This logging would not protect the recreational opportunities that otherwise should/would be provided by the Trail (e.g., aesthetics, interior-forest plant/wildlife viewing opportunities, dispersed/primitive recreation, opportunities to experience solitude, spiritual values).

Response: *The Allegheny Trail addition proposed in scoping is no longer included in the proposed action for Potts Creek. During field surveys, potential issues were identified due to the proposed trail’s proximity to water features and private lands. Upon further consideration, it was determined that the proposal would not have met the purpose and need and is more appropriately handled in a strategic recreation-focused project that considers the larger Forest trail strategy.*

Economics

Economics - #1: The Forest Service should include an economic assessment as part of the environmental analysis.

01-#17-01 Would this be yet another below-cost timber sale? America is in bad shape economically, and below-cost sales need to cease. Regardless of what some in the FS may think, money doesn’t grow on trees.

01-#13-01 Management of this area should occur in a cost-efficient manner. The timber program on the George Washington and Jefferson National Forest loses money. The Forest Service should complete an economic analysis that discloses whether this timber sale, or any parts of it, would be below-cost timber sales. An ecological valuation and net public benefit valuation should be conducted to determine the value of wildlife, fish, soils, water, recreational, scenic, and amenity values of resources lost or degraded as a result of this project.

Response: *The ability to generate revenue from timber sales is not connected to the purpose and need of the project. While economic viability is a consideration in selecting an alternative for implementation, it is not the sole factor considered. Maximizing net value is not the primary purpose at the expense of detrimental impacts on natural resources within the project area. As stated in Chapter 1 of the EA, the purpose and need for this project is to create a variety of forest structural conditions for wildlife habitat in the project area. Timber harvest in the proposed action is driven by the need to achieve the Desired Future Condition for the project area, rather than the value of the trees themselves.*

Heritage

Heritage - #1: The Forest Service should provide for public review the complete analysis for effects to cultural/archaeological resources and consult with the appropriate organizations, agencies, and individuals.

01-#13-01 Complete cultural resources surveys should have been completed which satisfy the terms of the National Historic Preservation Act, and other laws regarding cultural resources, Native American cultural resources, religion, and traditional practices and their implementing regulations. Thorough surveys should be done. The FS should consult with Native Americans and others who are knowledgeable regarding cultural resources that are found or might be found in the project area. The FS should include in its documentation, the survey methodology used, a copy of any Memoranda of Agreement with the State Historic Preservation Office, and the qualifications of the people doing the survey work.

01-#13-01 Has the FS identified areas with high potential for disturbance? Areas with high potential for significant historic and prehistoric sites in this area? How will these areas be affected? How will sites on the National Register of Historic Places (or eligible areas) be affected? Will any aspect of the project increase the likelihood of vandalism or destruction of cultural sites due to greater access, greater visitor use, or greater visibility?

Response: *All proposed project areas has been surveyed for historic and prehistoric resources and all appropriate Tribal and State Historic Preservation Officers have been*

consulted. Any and all prehistoric or historic resources will be avoided during project implementation. Please refer to Chapter 3 of the EA.